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VIA ECF

Magistrate Judge Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Furfero v. St. John's University et al*
1:20-cv-02395-BMC-LB**

Dear Magistrate Judge Bloom:

We represent Defendants in the above-referenced matter. We write, jointly with Plaintiff to provide this status update and to request an extension of time to file the proposed discovery plan under Federal Rule of Civil Procedure 26(f)(3), as set forth in Your Honor's March 2, 2021 order (ECF Dkt. No. 20). On March 31, 2021 Defendants filed a premotion conference letter outlining their intention to file a motion to dismiss Plaintiff's amended complaint. On that same day, Judge Cogan waived the premotion conference requirement and stated that Defendants' premotion conference letter was being treated as their motion to dismiss. Judge Cogan also set a deadline for Plaintiff to respond to Defendants' motion by April 14, 2021. Accordingly, the parties request that Your Honor briefly extend the time period to set a discovery schedule pending the outcome of the motion currently before before Judge Cogan.

Respectfully submitted,

/s/

Barbara A. Gross

cc: Plaintiff Dr. Joyce Furfero (drfurfero@drfurfero.com)